

# Exhibit 1

## 3505-2

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

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IN RE: JUUL LABS, INC., )  
MARKETING, SALES PRACTICES, )  
AND PRODUCTS LIABILITY )  
LITIGATION )  
This Document Relates to )  
Clark Fish )  
vs. ) Case No.  
JUUL LABS, INC., et al., ) 19-md-2913-WHO  
Case No. 3:20-cv-05653 )  
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VIDEOTAPED VIDEOCONFERENCE DEPOSITION OF  
MEGHAN WALLACE

Tuesday, September 28, 2021

Reported By:

SUSAN A. SULLIVAN, CSR #3522, RPR, CRR

Job No. 200199

1 Q BY MS. KRISTOVICH: Ms. Wallace, do you  
2 know how much SFUSD spends for staff resources for  
3 on-campus vaping or tobacco education?

4 A No.

5 Q Do you know how much SFUSD spends on  
6 resources for community and parent education?

7 A No.

8 Q Do you know how much the district spends  
9 on developing prevention curriculum?

10 A No.

11 Q Do you know how much the district spends  
12 on addiction counseling or treatment?

13 A No.

14 Q Do you know how much the district spends  
15 on student discipline or legal proceedings?

16 A No.

17 Q On that note, if students were suspended  
18 for vaping that would affect the average daily  
19 attendance, correct?

20 A Yes.

21 Q And if the average daily attendance goes  
22 down the funding that SFUSD receives from the state  
23 goes down as well, correct?

24 A Yes.

25 Q Are you aware of any policy or push to

1 use e-cigarettes or vape use JUUL devices as  
2 opposed to another device?

3 A No, I don't.

4 Q Do you know how much if any money SFUSD  
5 has spent on JUUL pod cleanup or disposal?

6 A No, I don't.

7 Q Are you aware if there are any contracts  
8 between SFUSD and JUUL Labs?

9 A No, I'm not.

10 Q In other words, in the procurement  
11 division of your office are you aware of any  
12 contracts that the procurement division has signed  
13 with JLI?

14 A I'm not aware of them if there are any.

15 Q Are you aware -- okay.

16 Are you aware of any JUUL-sponsored  
17 programs on campus?

18 A No, I'm not.

19 Q Are you aware of any JUUL ads that have  
20 run or been shown on any SFUSD campus?

21 A No.

22 Q Are you aware of a JUUL representative  
23 ever visiting any SFUSD school campus?

24 A No.

25 Q Are you aware of any JUUL devices or pods

1 But to be clear, no one from SFDS has ever  
2 approached you and said hey, we really need to --  
3 we really need more money because we need it for  
4 anti-vaping or anti-tobacco education, correct?

5 MR. DOUGLAS: Object to form.

6 THE WITNESS: Correct.

7 MS. KRISTOVICH: Okay. Let's take a quick  
8 break, Ms. Wallace, and then I think I will have a  
9 few more documents and then we may be able to wrap  
10 up at least from the JLI perspective.

11 Daryl, ten minutes?

12 MR. DOUGLAS: Okay.

13 THE VIDEOGRAPHER: Off the record. The  
14 time is 12:17.

15 (Recess taken)

16 THE VIDEOGRAPHER: Back on the record.  
17 The time is 12:27.

18 (Wallace Exhibit 5, COVID-19 Operations  
19 Written Report and Recommended Budget For Fiscal  
20 Year 2020-2021, Bates Nos. SFUSD\_001342 to  
21 SFUSD\_001397, marked for identification, as of this  
22 date.)

23 BY MS. KRISTOVICH:

24 Q Welcome back, Ms. Wallace.

25 If you could take a look at what I have

1 MS. KRISTOVICH: Okay. That is all that I  
2 have, Ms. Wallace. There may be counsel for Altria  
3 or others who have questions for you but that's all  
4 that I have.

5 Mr. Omorogieva?

6 MR. OMOROGIEVA: Ms. Wallace, how are you  
7 doing?

8 THE WITNESS: I'm doing well. Thank you.

9 MR. OMOROGIEVA: Are you ready to get  
10 started?

11 THE WITNESS: Yes.

12  
13 EXAMINATION

14 BY MR. OMOROGIEVA:

15 Q Do you know what Altria is?

16 A No, I don't.

17 Q Are you aware of the relief SFUSD is  
18 seeking against Altria in this lawsuit?

19 A I'm sorry, could you restate the question?

20 Q Are you aware of the relief that the  
21 school district is seeking against Altria in this  
22 lawsuit?

23 A I'm not familiar with it.

24 Q Are you aware of any specific school  
25 district's tobacco education or prevention

1 programming for acts specifically done by Altria?

2 A No, I'm not.

3 Q Are you aware of SFUSD budgeting for any  
4 acts specifically done by Altria?

5 A No.

6 Q Are you aware of any JUUL advertising or  
7 marketing done by Altria in SFUSD?

8 A No.

9 Q You are aware of the school district's  
10 allegations against Altria in this lawsuit?

11 A No.

12 Q Are you aware of who Philip Morris is?

13 A Yes.

14 Q What's your understanding about who Philip  
15 Morris is?

16 A Just that it is a big company and probably  
17 has affiliates.

18 Q Are you aware of the school district's  
19 allegations against Philip Morris in this lawsuit?

20 A No, I'm not.

21 Q Do you know if it is illegal for people  
22 under the age of 21 to purchase tobacco products in  
23 California?

24 A No.

25 Q During your time with the school district

1 are you aware of students receiving emails,  
2 mailings or texts from Altria about JUUL products?

3 A No.

4 Q Are you aware of students in the school  
5 district receiving emails, mailings or texts from  
6 Philip Morris about JUUL products?

7 A No.

8 Q Are you aware of students in the school  
9 district visiting Altria's website?

10 A No.

11 Q Are you aware of students in the school  
12 district visiting the Philip Morris website?

13 A No.

14 Q During your time at the school district  
15 are you aware of students seeing JUUL  
16 advertisements or marketing on cigarette packages?

17 A No, I'm not.

18 Q Are you aware of SFUSD students seeing any  
19 advertisements from Altria?

20 A No, I'm not.

21 Q Are you aware of SFUSD students purchasing  
22 JUUL products from a store that receives services  
23 from Altria?

24 A No.

25 Q Are you aware of any Altria marketing for



1 JUUL products targeted to minors?

2 A No.

3 Q Are you aware of any specific SFUSD  
4 student who was misled by Altria about the effects  
5 of JUUL products?

6 A No.

7 Q Are you aware of SFUSD employees receiving  
8 communications directly from Altria?

9 A No.

10 Q Have you ever communicated with an  
11 employee or agent of Altria?

12 A No.

13 Q Are you aware of SFUSD employees receiving  
14 communications directly from Philip Morris?

15 A No.

16 Q Are you aware of Altria providing any  
17 services to retailer stores in the school district?

18 A No.

19 MR. OMOROGIEVA: That's all I have for  
20 you, Ms. Wallace. Thank you.

21 THE WITNESS: Thank you.

22 MR. DOUGLAS: I have no questions.

23 THE VIDEOGRAPHER: Anything further from  
24 any other counsel?

25 MS. KRISTOVICH: Nothing from me.